

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE ER REGULATORY CONTACT RECORD

Date/Time: August 25, 2005 / 10:00 a.m.

Site Contact(s): K-H: Karen Wiemelt, Susan Serreze

Phone: 303-692-2035 – CDPHE
303/312-6312 - EPA
303/966-4226 – DOE

Agency: CDPHE: Harlen Ainscough, Dave Kruchek, Carl Spreng
EPA: Sam Garcia, Larry Kimmel, Todd Bechtel
DOE: Norma Castañeda

Purpose of Contact: A meeting was held on August 25, 2005 to discuss the Draft Closeout Report for NPWL, Nature and Extent of Surface Water and Sediment Contamination Section of the RI, 400 Area HRR Write ups, and 500 Area HRR Write ups

Discussion: See meeting minutes below.

Contact Record Prepared By: Susan Serreze

**August 25, 2005 Comment Resolution Meetings
For
Draft Closeout Report NPWL
Nature and Extent of Surface Water and Sediment Contamination Section of the RI
400 Area HRR Write ups
500 Area HRR Write ups**

A meeting was held on August 25, 2005 to discuss the Draft Closeout Report for NPWL, Nature and Extent of Surface Water and Sediment Contamination Section of the RI, 400 Area HRR Write ups, and 500 Area HRR Write ups.

Attendees

CDPHE: Harlen Ainscough, Dave Kruchek, Carl Spreng
EPA: Sam Garcia, Larry Kimmel, Todd Bechtel (Greystone)
DOE: Norma Castaneda
K-H Team: Karen Wiemelt, Susan Serreze, Steve Nesta, Gary Carnival, Laura Brooks, Rich Henry

ADMIN RECORD

1A-A-002904

Report Status

Issues

No Sitewide issues were discussed.

Specific Comments

Draft Closeout Report for NPWL

Written comments were received from CDPHE and EPA. The following resolutions were agreed to:

CDPHE

General comments

1. The results of actions associated with the RCRA unit closure will be discussed in the RCRA closure report. Actions conducted by ER, including pipe and valve vault removal and soil sampling will be discussed in this report.

Specific comments

2. Radionuclides will be added to the list of waste streams. Remedial actions conducted on the lines will be discussed in the RCRA closure report but summarized in this report. Radionuclide results will be included in the report.
3. Radionuclides will be added to the list of waste streams.
4. In Section 2.2.4, the disposition of americium and plutonium will be researched and clarified.
5. The numbers of buildings, UBCs, and tanks of interest will be shown on maps. Additionally, NPWL not part of RCRA Unit 374.3 will be designated.
6. On Figure 2, the samples shown east of NPWL from Building 122 will be evaluated to determine if they are relevant.
7. Valve vaults and tanks will be identified on Figure 3 and the status of the NPWL associated with Building 559 will be changed on this and other figures.
8. On Figure 4, the samples shown north of Building 771 will be evaluated for relevance. Valve vault 9 will be identified. The status of the NPWL associated with Building 561 will be checked and corrected as necessary.
9. The lift station associated with Building 881 will be shown. Additionally, the sample shown in Building 884 will be evaluated for relevance.
10. Section 4.1 will be expanded to identify actions that affected NPWL. The documentation of the status of NPWL will be discussed in the RCRA closure report.
11. The Section 4.2 discussion will be expanded to include characterization and confirmation sampling results and soil removal activities.

12. The rationale for collecting confirmation samples will be added to Section 5.
13. Section 7.0 will be revised to include information regarding remaining contamination associated with valve vaults.
14. Screen 2 of the SSRS will be modified to include all areas under consideration.
15. The word "vault" will be added to the 1st bullet on page 67. Additional information will be added to the 2nd bullet to describe the areas under consideration. The 3rd bullet will be changed to include remaining radionuclides in lines and bullets. Additionally, uranium will be described as mobile. The 4th bullet will reference background instead of WRW ALs. Groundwater monitoring will be added to the 5th bullet.
16. Section 8.1 will be changed to correctly state that not all valve vaults were removed. The condition of the pipelines and valve vaults remaining will be discussed in the RCRA closure report. Residual contamination in soil will be discussed in this report. Surface stabilization and revegetation will be added to this section.
17. The condition and remaining contamination in the pipelines and valve vaults remaining will be discussed in the RCRA closure report.
18. A summary of data quality will be added to Section 14.0.
19. The word "eliminating" will be replaced by "reducing" in Section 15.0. Additionally, a statement recognizing the residual contamination in pipes and valve vaults will be added to this section.

EPA Comments

1. Text will be added to the Executive Summary indicating why pipelines and valve vaults were removed.
2. Section 4.1 will be modified to include NPWL disposition across the IA.
3. Figure 7 will be reviewed to determine whether references to the 300/500 area is redundant.
4. Section 8.1 will be changed to correctly state that not all valve vaults were removed.

Draft Nature and Extent of Surface Water and Sediment Contamination

Written comments were received from EPA and CDPHE. The following resolutions were agreed to:

EPA Comments

1. The comment indicating that Volume 2 of the CRA is still under EPA review is noted.
2. The discrepancy between the number of AOIs described in Section 4.2 and Section 4.2.4 will be checked and corrected as necessary.
3. The discrepancy between the number of AOIs in Section 6.3.1 and Table 3 will be checked and corrected as necessary.

4. The discrepancy between the number of AOIs in two sentences in Section 6.4 will be checked and corrected as necessary.
5. An explanation for the elimination of vinyl chloride from the surface water AOI list will be added to Table 2.

CDPHE Comments

1. The flow chart (Figure 3) will be modified to include more information to clarify the screening process.
2. A statement regarding qualification of process knowledge will be added to Section 4.1.5.
3. A statement indicating that process knowledge is known to a certain extent and is used in part, but is not the only criteria used to determine whether an AOI is retained will be added to Section 4.1.
4. The flow chart will be clarified to indicate the process for analytes without background values.
5. Discussion of changing flow regimes is included in the Fate and Transport Section of the RI.
6. A statement indicating that process knowledge is known to a certain extent and is used in part, but is not the only criteria used to determine whether an AOI is retained will be added to Section 4.1.

400 Area HRR Write up

Written comments were received from CDPHE and EPA. The following resolutions were agreed to:

CDPHE Comments

1. PAC 400-122 – The word “contaminant” is misspelled and will be corrected.
2. PAC 400-136.2 – The boundary of this PAC will be added to the 400 Area Figure.
3. PAC 400-157.2 – The location of the excavation around the tank will be clarified.
4. PAC 400-157.2 – CDPH will be corrected to CDPHE.
5. PAC 400-187 – The label for Building 443 will be added to the 400 Area Figure.
6. PAC 400-187 – The word “concentration” is misspelled and will be corrected.
7. PAC 400-187 – In the No Further Action Recommendation Section the word “required” will be changed to “necessary”.
8. PAC 400-205 – This write up will be finalized as soon as information is available.
9. PAC 400-207 – The word “arsenic” is misspelled and will be corrected.
10. PAC 400-207 – in the No Further Action Recommendation Section the word “required” will be changed to “necessary” and the word “accelerated” will be added before action.

11. PAC 400-800 – Aroclor 1260 will be compared to the WRW soil AL.
12. PAC 400-800 – A discussion of the DOE PCB “white paper” will be added.
13. PAC 400-801 – In the No Further Action Recommendation Section the word “required” will be changed to “necessary” and the word “accelerated” will be added before action.
14. PAC 400-801 – A fourth bullet regarding the storm drain and PCB contaminated sediment under Building 447 will be added.
15. PAC 400-802 – The label for Building 334 will be added to the 400 Area Figure.
16. PAC 400-803 – The label for Building 446 will be added to the 400 Area Figure.
17. PAC 400-803 – In the No Further Action Recommendation Section the 3 times the AL will be clarified to be specific to surface soil.
18. PAC 400-805 – The rationale for not collecting accelerated action samples will be added.
19. PAC 400-807 – The locations of PACs 807 and 810 will be corrected on the 400 Area Figure or, if necessary, the current locations will be explained.
20. PAC 400-810 – This write up will be finalized as soon as information is available.

EPA Comments

1. PAC 400-803 – The depths and concentrations of contaminants left in place will be identified.
2. PAC 400-207 – The dumpster will be renamed as a tank.
3. PAC 400-207 – The word “arsenic” is misspelled and will be corrected.
4. PAC 400-205 – This write up will be finalized as soon as information is available.
5. PAC 400-157.2 – The word “decontaminated” is misspelled and will be corrected.
6. PAC 400-157.2 – The depths and concentrations of contaminants left in place will be identified.
7. PAC 400-129 – CDPH will be corrected to CDPHE.
8. 400 Area Figure – IHSSs 161 and 120.2 will be removed from the map unless they are mentioned in one of the 400 Area write ups.
9. 400 Area Figure – The boundary of this PAC will be added to the 400 Area Figure.

500 Area HRR Write up

Written comments were received from CDPHE and EPA. The following resolutions were agreed to:

CDPHE Comments

1. PAC 500-117.1 – The form of radiation and whether there was any indication of a suspected source will be researched and added if found.

2. PAC 500-117.1 – The text regarding the OU 13 RFI/RI activities will be reviewed and changed for clarity.
3. PAC 500-117.1 – The information regarding IA-wide HPGe surveys will be changed to include HPGe surveys at IHSS 117.1.
4. PAC 500-117.1 – A discussion on uranium will be added.
5. PAC 500-117.1 – The information regarding HPGe “hot spots” will be revised and qualified.
6. PAC 500-117.1 – The maximum concentrations of chlorinated solvents will be added.
7. PAC 500-117.1 – The applicable PRGs or ALs will be referenced.
8. PAC 500-117.1 – The inclusion of PAC 500-197 in the IHSS 117.1 investigation will be noted.
9. PAC 500-117.1 – The acronym “SSRS” is misspelled and will be corrected.
10. PAC 500-117.2 – The text regarding the OU 13 RFI/RI activities will be reviewed and changed for clarity.
11. PAC 500-117.2 – The maximum concentrations of relevant radionuclides and metals will be added.
12. PAC 500-117.2 – Information regarding HPGe “hot spots” will be revised and qualified.
13. PAC 500-158 – The maximum concentrations of relevant radionuclides and metals will be added.
14. PAC 500-159 – The information regarding IA-wide HPGe surveys will be changed to include HPGe surveys at IHSS 159.
15. PAC 500-159 – Information regarding HPGe “hot spots” will be revised and qualified.
16. PAC 500-159 – The maximum concentrations of relevant COCs will be added.
17. PAC 500-197 – The information regarding IA-wide HPGe surveys will be changed to include HPGe surveys at IHSS 197.
18. PAC 500-197 – Information regarding HPGe “hot spots” will be revised and qualified.
19. PAC 500-197 – The maximum concentrations of relevant COCs will be added.
20. PAC 500-197 – the applicable PRGs or ALs will be referenced.
21. PAC 500-197 – Additional text will be added to the No Further Accelerated Action Recommendation that arsenic was less than 3 times the WRW soil AL.
22. PAC 500-904 – The text will be changed to indicate that CDPHE accepted, rather than approved, the RCRA Closure.
23. PAC 500-907 – PAC 500-907 will be added to the 500 Area figure.

24. PAC 500-907 – The reference to RCRA Unit 200 will be researched and corrected as necessary.
25. PAC 500-907 – The reference to IHSS 172 will be clarified.
26. PAC 500-907 – The reference to IHSS Group 500-1 will be changed to 500-7.
27. PAC 500-908 – PAC 500-908 and IHSS 156 will be added to the 500 Area figure.

EPA Comments

1. PAC 500-907 – PAC 500-907 will be added to the 500 Area figure.
2. PAC 500-908 – PAC 500-908 will be added to the 500 Area figure.
3. 500 Area figure – Location not discussed in the 500 Area write ups will be removed from the maps. Additionally, buildings and structures will be labeled.

Other Issues

There were no other issues.

V. Meetings

The next meeting will be held on September 1, 2005 at 10:00 AM in the Breckenridge Room.

Required Distribution:

M. Aguilar, USEPA
S. Bell, DOE-RFFO
J. Berardini, K-H
B. Birk, DOE-RFFO
L. Brooks, K-H ESS
M. Broussard, K-H RISS
L. Butler, K-H RISS
G. Carnival, K-H RISS
N. Castaneda, DOE-RFFO
C. Deck, K-H Legal
S. Gunderson, CDPHE
M. Keating, K-H RISS
G. Kleeman, USEPA
D. Kruchek, CDPHE
D. Mayo, K-H RISS

R. McCallister, DOE-RFFO
J. Mead, K-H ESS
S. Nesta, K-H RISS
L. Norland, K-H RISS
K. North, K-H ESS
E. Pottorff, CDPHE
A. Primrose, K-H RISS
R. Schassburger, DOE-RFFO
S. Serreze, K-H RISS
D. Shelton, K-H ESS
C. Spreng, CDPHE
S. Surovchak, DOE-RFFO
K. Wiemelt, K-H RISS
C. Zahm, K-H Legal

Additional Distribution:
